IN THE UNITED STATES COURT OF FEDERAL CLAIMS

DNC PARKS & RESORTS AT YOSEMITE, INC.,))
Plaintiff,))
V.))
THE UNITED STATES OF AMERICA,) No. 15-1034C
Defendant	Judge Campbell-Smith
-and-))
YOSEMITE HOSPITALITY, LLC,)
Third-Party Defendant.)))

NOTICE OF JOINT PROPOSED PROTECTIVE ORDER

As required by this Court's Opinion and Order, dated April 12, 2018, ECF No. 120 ("Order"), plaintiff DNC Parks & Resorts at Yosemite, Inc. ("DNCY"), defendant the United States, and third-party defendant Yosemite Hospitality, LLC ("Aramark"), stipulate to and propose the attached protective order for the Court's approval.

Respectfully submitted,

Counsel for DNC Parks & Resorts at Yosemite, Inc.

AKIN GUMP STRAUSS HAUER & FELD, LLP

/s/ Thomas P. McLish

Thomas P. McLish 1333 New Hampshire Avenue, N.W. Washington, D.C. 20036-1564 (202) 887-4000 (Tel) (202) 887-4288 (Fax)

Email: tmclish@akingump.com

PHILLIPS LYTLE LLP

Nicolas J. Rotsko 125 Main Street Buffalo, NY 14203-2887 (716) 847-8400 (Tel) (716) 852-6100 (Fax)

Email: nrotsko@phillipslytle.com

Counsel for the United States of America

CHAD A. READLER

Acting Assistant Attorney General

ROBERT E. KIRSCHMAN, JR.

Director

/s/ Claudia Burke

Claudia Burke Assistant Director

/s/ John H. Roberson

JOHN H. ROBERSON Senior Trial Counsel Commercial Litigation Branch Department of Justice P.O. Box 480 Ben Franklin Station

Washington, D.C. 20044 Tele: (202) 353-7972

Fax: (202) 514-8640

Email: John.Roberson@usdoj.gov

Of Counsel SCOTT BOLDEN Civil Division

MARGARET J. JANTZEN IGOR HELMAN Trial Attorneys Department of Justice

Counsel for Yosemite Hospitality, LLC

WILMER CUTLER PICKERING HALE AND DORR LLP

/s/ Jamie S. Gorelick

Jamie S. Gorelick 1875 Pennsylvania Ave. NW Washington, D.C. 20006

Tel.: (202) 663-6000 Fax: (202) 663-6363

jamie.gorelick@wilmerhale.com

Of Counsel Carl Nichols WILMER CUTLER PICKERING HALE AND DORR LLP 1875 Pennsylvania Ave. NW

Tel.: (202) 663-6000 Fax: (202) 663-6363

carl.nichols@wilmerhale.com

Vinita Ferrera WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109

Tel.: (617) 526-6000 Fax: (617) 526-5000

vinita.ferrera@wilmerhale.com

Dated: April 30, 2018